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By CM/ECF

The Chambers of the Honorable Judge Sanket J. Bulsara
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Elliott v. Donegan, et al.*, No. 1:18-civ-05680-LDH-SJB

Dear Judge Bulsara

I write on behalf of Moira Donegan, a Defendant in the above-referenced matter. As Your Honor may be aware, we have requested a conference with Judge DeArcy Hall regarding our forthcoming motions to dismiss and to stay all discovery in the case (Dkt. #17). We therefore respectfully request that, pending Judge DeArcy Hall's decision on our motion to stay discovery, Your Honor (1) adjourn our initial conference, currently scheduled for February 8, 2019, and (2) reserve decision on Plaintiff Stephen Elliott's motion for a subpoena against Google, Inc., (Dkt. #19). Opposing counsel does not consent to these two requests.

Respectfully Submitted,

/s/ Roberta A. Kaplan

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